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10 Attorneys for Defendant
BACKGROUNDCHECKS.COM LLC

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12 UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA
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15 Jose A. Iraheta Hernandez,
16 Plaintiff/s,
17 vs.
18 Backgroundchecks.com, LLC,
19 Defendant/s.
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Case No. 2:20-cv-01766-GMN-BNW

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME FOR
DEFENDANT TO RESPOND TO
PLAINTIFF'S SECOND AMENDED
COMPLAINT**

[FIRST REQUEST]

23 Plaintiff JOSE A. IRAHETA HERNANDEZ ("Plaintiff") and Defendant
24 BACKGROUNDCHECKS.COM LLC ("Defendant") by and through their undersigned counsel,
25 hereby agree and stipulate to extend the time for Defendant to file a response to the Second Amended
26 Complaint two (2) weeks from December 28, 2020 up to and including **January 11, 2021**.

27 The requested extension is necessary in light of the upcoming holiday and the need for
28

1 additional time to investigate the allegations in the Second Amended Complaint and prepare a
2 sufficient responsive pleading.

3 This is the first request for an extension of time to respond to the Second Amended Complaint.
4 This request is made in good faith and not for the purpose of delay.

5 Dated: December 22, 2020

6 Respectfully submitted,

Respectfully submitted,

7
8 /s/ Michael Kind

/s/ Diana Dickinson

9 MICHAEL KIND, ESQ.
10 KIND LAW
11 GEORGE HAINES, ESQ.
GERADO AVALOS, ESQ.
FREEDOM LAW FIRM, LLC

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12 Attorneys for Plaintiff
JOSE A. IRAHETA HERNANDEZ

Attorneys for Defendant
BACKGROUNDCHECKS.COM LLC

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15 **ORDER**

16 **IT IS SO ORDERED**

17 **DATED:** 12:19 pm, December 23, 2020

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20 **BRENDA WEKSLER**
21 **UNITED STATES MAGISTRATE JUDGE**

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25 4846-9466-7476.1 103757.1007